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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

JUN 0 1 1991

In the Matter of) FOO WAL ROOM
Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations) MM Docket) RM
(Clarksdale Mississippi)	j

To: The Commission

PETITION FOR RULE MAKING

Comes now Leroy P. Jenkins, Jr., d/b/a Delta Blues Broadcasting (hereafter "Petitioner"), pursuant to Section 1.401 of the Commission's Rules, and respectfully petitions the Commission to amend the FM Table of Allotments, 47 C.F.R. 73.202(b), to allocate FM Channel 221A to Clarksdale, Mississippi, as that community's fourth local FM service.

Proposal of Petitioner:

City	<u>Channel l</u> <u>Present</u>	<u>Numbers</u> <u>Proposed</u>
Clarksdale, Mississippi	243C3, 268C3, 293C2	221A, 243C3, 286C3, 293C2
		/

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In support of this proposal, the following information is herewith submitted for consideration:

Clarksdale is an incorporated city located in northwest Mississippi, approximately 210 kilometers north-northwest of Jackson, Mississippi. It is the county seat of Coahoma County, Mississippi. The city population is 19,717 and the county population is 31,665 1/. Adoption of this proposal will provide Clarksdale with its fourth local FM broadcast service.

Attached hereto and made a part of this petition is a Technical Exhibit in support of the requested allotment. Based on the information contained therein, it appears that the requested channel could be allocated to Clarksdale, in full compliance with the minimum distance separation requirements of Section 73.207(b) of the Commission's Rules, with a site-restriction as specified in the Technical Exhibit.

^{1/} Population figures from the 1990 U.S. Census.

If this proposal is adopted, Petitioner will promptly apply for authority to construct and operate a new FM broadcast station at Clarksdale, Mississippi. Ιf construction permit is granted, Petitioner will promptly construct and operate the proposed station.

In accordance with Section 1.52 of the Commission's Rules and Regulations, I hereby certify that I have examined the foregoing Petition for Rule Making and the attached Technical Exhibit and that both are true and correct to the best of my knowledge and belief.

WHEREFORE, it is respectfully requested instant petition be granted and that the FM Table of Allotments, Section 73.202(b), be amended as requested herein.

Respectfully submitted,

LEROY P. JENKINS, JR., d/b/a

DELTA BLUES BROADCASTING

Leroy P. Jenkins, Jr.

P.O. Box 139

Gunnison, MS 38746

TECHNICAL EXHIBIT

IN SUPPORT OF PETITION FOR RULE MAKING **NEW FM - CHANNEL 221A** CLARKSDALE, MISSISSIPPI

DELTA BLUES BROADCASTING

Prepared May 22, 1994

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TECHNICAL EXHIBIT

IN SUPPORT OF PETITION FOR RULE MAKING NEW FM - CHANNEL 221A CLARKSDALE, MISSISSIPPI

DELTA BLUES BROADCASTING

INTRODUCTION

This Technical Exhibit supports the petition of Delta Blues Broadcasting, seeking to amend the FM Table of Allotments, Section 73.202(b) of the Rules, by allocating FM Channel 221A to Clarksdale, Mississippi, as that community's fourth commercial FM channel.

ALLOCATION

A study was performed using the computerized SEARCHFM frequency search program and the current FCC/NTIS database to determine if Channel 221A could be allocated in compliance with the minimum distance separation requirements of Section 73.207(b) of the Commission's Rules. The study included all applicable co-channel, adjacent-channel and IF separations. The results of that study indicate that Channel 221A may be allocated to Clarksdale in full compliance with Section

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73.207(b), providing a site-restriction approximately 4 kilometers west of Clarksdale is imposed. The site-restriction would be necessary in order to avoid short-spacing to the authorized facilities of Station WUMS(FM), Channel 221A at University, Mississippi.

The "useable area" for Channel 221A is indicated on Exhibit A, attached hereto. The exhibit depicts the required separation arcs from all pertinent co-channel and adjacent channel stations and allocations. As indicated, there is ample area in the vicinity of Clarksdale in which to locate a transmitter site. Assuming maximum Class A facilities (6 kw @ 100 meters above average terrain), a transmitter site at any location within the useable area would enable the proposed station to provide adequate city-grade (70 dBu) coverage to the entire city, in full compliance with Section 73.315(a) and (b).

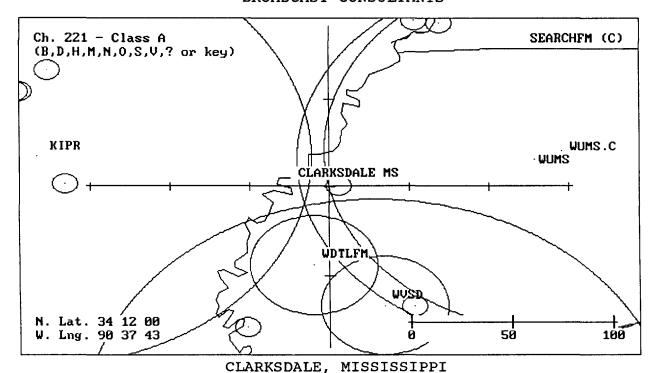
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CONCLUSION

The proposed change in the table of allotments will not create a short-spacing to any existing station, pending application or vacant allotment, and will not require the reallocation of any station, pending application or vacant allotment.

A copy of the separation study for Channel 221A is attached hereto as Exhibit B and made a part of this report (only those stations and channels sufficiently close for concern are noted therein).

CONTEMPORARY COMMUNICATIONS BROADCAST CONSULTANTS



NEW FM "DROP-IN" STUDY

			CHANNEL 22	1 - 92.1	MHZ -				
	CALL TYPE	CH# CITY LAT LNC	3			D-KM D-Mi		MARGIN (KM)	
•	WUMS LI CN	221A Univers: 34 21 29 89 Student Media	32 30	MS 5.000 kW	80.1 100M	101.61 63.2	115.0 71.5	-13.39 * <u>1</u>	,/
	WUMS.C CP CN	221A Univers: 34 24 12 89 Student Media	ity 24 13	MS 5.000 kW the U	78.7 100M	115.01 71.5 BPH93030	115.0 71.5 01IC	0.01 <	
	WJNSFM LI ZCN	221C3 Yazoo C 32 50 48 90 St. Pe' Broad	23 18 20	0.000 kW	109M	94.3	88.3	9.75	
		222C1 Pine Black 34 22 12 92 Cornerstone B	10 07 100	0.000 kW	286M	88.9	82.7		
	DE	224A Clevela 33 45 12 90 Contemporary	42 45	0.000 kW	OM	31.2	19.3		
	WDTLFM	224A Clevela	nd	MS	188.9	50.15	31.0	19.15	

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CLASS A

CALL TYPE	CH# CIT LAT	Y LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
LI CN	33 45 12 Delta Radi		3.000 kW	80M I	31.2 3LH86033	19.3 1KC	
WVSD LI CN	33 31 05	Bena 90 20 38 i Valley Sta	MS 3.000 kW ate Univ	160.8 89M B	80.10 49.8 LED90050	31.0 19.3)7KD	49.10

^{1/} License to Cover (File No. BLH-940428KC) filed for facilities authorized in construction permit BPH-930301IC.

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CERTIFICATION

State of Miss	issippi)
) ss.
County of Bol:	ivar)

I, Larry G. Fuss, do hereby certify as follows:

- I am a qualified and experienced broadcast consultant. I have been actively involved in the broadcast industry since 1972 and currently hold a lifetime FCC General Class Radio Telephone License (License No. PG-8-8450).
- 2) I have prepared numerous applications and rule making petitions which have been accepted for filing with the Federal Communications Commission.
- 3) I have been retained by Delta Blues Broadcasting to prepare the attached Technical Exhibit.
- 4) The Technical Exhibit, of which this deposition is a part, and the measurements, calculations, studies and determinations upon which this report is based, were prepared by me or under my supervision and direction. All material contained therein is believed to be true and correct, to the best of my knowledge and belief.

CAMPY B. Our	
Larry G! Fuss Affiant	
MAY 22, 1994	
Date	